

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WAYNE FARMS LLC

Plaintiff,

V.

JOHN DOE, A/K/A GRACIE,  
HENDERSON, A/K/A FRANK L  
ANNESE and LINKEDIN  
CORPORATION

## Defendants

Civil Action No.: 20-5191

Judge Feinerman

Magistrate Judge Valdez

**SECOND DECLARATION OF DAVID C BREZINA  
IN SUPPORT OF  
MOTION FOR DEFAULT JUDGMENT**

My name is David C. Brezina and:

(1) Exhibit 26 is a true and correct copy of two reports of process servers unable to locate Frank Annese at either of the addresses shown on bank records for accounts bearing that name.

(2) On or about October 14, 2020 I received documents from Wells Fargo regarding the account ending in 6603 identifying Frank L Annese, d/b/a Frankness Construction, 8150 Lakecrest Drive, Apt. 715, Greenbelt, MD, 20770-3344. I checked the Secretary of State of Maryland business database and there was no such business listed. The only Frank Annese for whom I found a telephone listing was a real estate agent. Because construction is complementary with real estate, I called the real estate agent who knew nothing about the construction company or Wayne Farms. I concluded it was likely that this was a case of identity theft.

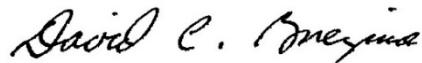
(3) Exhibit 27 was prepared by me November 6, 2020 after I received documents from BB and T Bank (d/b/a Truist Financial, d/b/a Truist Corporation) regarding the account ending in 6395 identifying Gracie Henderson, 2209 Tree Corners Pkwy, Norcross, GA 30092. I researched the name on the Internet and various free directory listings indicated people with that name. The database with the most complete information was <https://www.mylife.com/> which listed that address as a former address for a person 68 years of age. A print to pdf from that website is included in Exhibit 27 in the format created at that time by the browser – print program combination. There being no other connection to Wayne

Farms, other than the somewhat proximate location, and the 68 year old having moved to New Orleans, I concluded it was likely that this was a case of identity theft.

The undersigned, pursuant to Rule 11, and also being hereby warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, declares that the statements made of his/her own knowledge are true and that all statements made on information and belief are believed to be true.

Respectfully submitted,

Date: December 16, 2020

A handwritten signature in black ink that reads "David C. Brezina". The signature is written in a cursive, flowing style.

David C. Brezina (ID3121581)  
Attorneys for Plaintiff, Wayne Farms LLC

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